

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

12-17-07
04:59 PM

Order Instituting Rulemaking into the Review of the
California High Cost Fund B Program.

Rulemaking 06-06-028
(Filed June 29, 2006)

**REPLY COMMENTS OF VERIZON REGARDING
PROPOSED DECISION OF COMMISSIONER CHONG
IMPLEMENTING CALIFORNIA ADVANCED SERVICES FUND**

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TABLE OF CONTENTS

	<u>PAGE</u>
TABLE OF AUTHORITIES.....	ii
INTRODUCTION AND SUMMARY OF RECOMMENDATIONS	1
ARGUMENT	1
I. Most Parties Oppose Defining “Unserved” and “Underserved” Areas In Terms of The 3/1 Mbps Speed Benchmark	1
II. Most Parties Oppose The Lack of Factual Basis And Negative Impact of The PD’s 3/1 Mbps Speed Benchmark	2
III. Regulatory Requirements Associated With Funding Should Be Minimized	3
IV. Funding Concerns Could Be Alleviated By Reducing the Cap and Holding Several Rounds Of Grant Applications	4
CONCLUSION	5

TABLE OF AUTHORITIES

California Public Utilities Commission Decisions

D.96-10-066	4
D.07-09-020	3

California Statutes

Public Utilities Code § 321.1	2
-------------------------------------	---

Other

“An Analysis of the 2006 Idaho Rural Broadband Investment Program,” Don Reading, Consulting Economist, Ben Johnson Associates (February 2007), at 3-5, available at http://www.idahocable.com/Broadband%20Analysis%20Final.pdf	4
Broadband Deployment in California, California Public Utilities Commission (May 5, 2005)	2
http://www.oecd.org/sti/ict/broadband	2

Verizon¹ respectfully submits these reply comments to the Proposed Decision of Commissioner Chong (PD) regarding implementation of the California Advanced Services Fund (CASF), dated November 20, 2007.

INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

Many commenting parties raised concerns that the PD's proposed 3 Mbps download/1 Mbps upload speed benchmark lacks adequate factual support and, if adopted as proposed, would significantly impair the CASF program. These are serious issues and must be addressed in the final decision. In addition, the Commission must stand by its determination to reduce the burden on consumers of funding the CHCF-B program, and realistically consider the amount of funds available for the CASF. Based on review of opening comments, Verizon recommends the following changes to the PD:

- Adopt speed as one factor in evaluating applications, which must meet or exceed the current FCC definition of broadband, but eliminate the 3/1 standard as a benchmark due to the negative consequences of adopting any bright-line standard
- Limit support to truly unserved areas with no broadband access below the lowest 500 kbps speed tier mapped by the Broadband Task Force
- Adopt a staged approach for CASF grant applications and awards to insure sufficient funds and allow all sides to gain experience

ARGUMENT

I. Most Parties Oppose Defining “Unserved” and “Underserved” Areas In Terms of The 3/1 Mbps Speed Benchmark

The great majority of parties question the wisdom of funding projects in areas already served by one or more providers, whether at speeds above or below the proposed 3/1 benchmark.² These parties cite the lack of public benefit as well as the wasteful and anticompetitive effects of subsidizing additional competitors after a provider has already built broadband facilities *without any subsidy*.³ As these comments make clear, the Commission should be extremely hesitant to

¹ The Verizon affiliates submitting these comments include Verizon California Inc. (U-1002-C), Bell Atlantic Communications, Inc., d/b/a Verizon Long Distance (U-5732-C), MCI Communications Services, Inc, d/b/a Verizon Business Services (U-5378-C), MCI Metro Access Transmission Services, d/b/a Verizon Access Transmission Services (U-5253-C), TTI National, Inc., d/b/a Verizon Business Services (U-5403-C), Teleconnect Long Distance Services & Systems Co., d/b/a Telecom*USA (U-5152-C), and Verizon Select Services, Inc. (U-5494-C).

² “Unserved” areas are those not served by facilities meeting this standard, and “underserved” areas are those with only one facilities-based provider capable of providing these speeds to all customers. PD at 40.

³ Sprint/Nextel at 14; CCTA at 2; Cox at 3.

interfere with functioning markets, but should limit its role to market failures, as the PD states.⁴ Several parties also recommend targeting funding to areas identified by an objective third party, rather than by applicants alone.⁵ Relying on the impending report of the Governor's Broadband Task Force, as Verizon and others have urged, which will map speed tiers based on *combined* upload and download speed, would allow the Commission to target totally unserved areas with access below the minimum speed tier of 500 kbps.⁶ Consistent with Public Utilities Code § 321.1, the Commission must evaluate "the economic effects or consequences" of its suggested method of funding.⁷ Failure to do so would constitute legal error.

II. Most Parties Oppose The Lack of Factual Basis And Negative Impact of The PD's 3/1 Mbps Speed Benchmark

The great majority of parties also oppose the PD's use of the 3/1 Mbps benchmark to evaluate applications as factually unsupported and anticompetitive.⁸ Only TURN expressly advocates a higher standard,⁹ even going so far as to support symmetrical download and upload speeds.¹⁰ However, TURN earlier supported the Commission's 3/1 speed standard as a "general guidepost" rather than a "requirement,"¹¹ a view that comports with Verizon's recommendation that speed be considered but not specifically benchmarked.¹² To the extent TURN recommends an absolute benchmark higher than 3/1, particularly a symmetrical one, its factual basis falls short: the OECD statistics it cites show substantially *lower* average upload speeds than TURN supports, for the entire OECD area, i.e., DSL 1.2Mbps, Cable .75, FTTx 62.7, and Wireless .12, respectively.¹³

DRA also expressed concern that the 3/1 benchmark could "soon become out-of-date,"¹⁴ a concern that ignores the market's continued upward pressure on network speeds.¹⁵ Rather than attempting to guarantee the PD's arbitrary standard through measurement, as DRA suggests, the Commission should eschew a specific benchmark and instead prioritize applications based on

⁴ PD at 6 ("the public sector has a role to play ...where... the market has failed to bring advanced communications"); PD at 46, Finding of Fact 6.

⁵ TURN at 11; DRA at 12; and Verizon at 12.

⁶ California Broadband Task Force request letter to providers, dated August 2, 2007, at 2-3.

⁷ Pub. Util. Code § 321.1 ("it is the intent of the Legislature that the commission assess the economic effects or consequences of its decisions as part of ... each proceeding...").

⁸ See, e.g., AT&T at 6; Cox at 8; T-Mobile at 12; Sprint/Nextel at 5-6; and Verizon at 7.

⁹ TURN at 9.

¹⁰ TURN at 10.

¹¹ Reply Comments of TURN on Phase II Issues Relating to the California Advanced Services Fund, filed October 3, 2007 (TURN CASF Reply), at 8.

¹² Verizon at 8-9.

¹³ <http://www.oecd.org/sti/ict/broadband>

¹⁴ DRA at 9, 10.

¹⁵ Broadband Deployment in California, California Public Utilities Commission (May 5, 2005), at 3.

speed as a “factor”. As explained in opening, adoption of an arbitrary speed standard will *not* magically increase network speeds or persuade consumers to pay for higher speeds, but will lead to other negative results.¹⁶

The Commission can and should prioritize applications based on speed, but not on an unsupported and arbitrary bright-line standard. Such a specific threshold is premature and unnecessary, as the FCC is poised to revise its own widely-used definition of broadband.¹⁷ Rather, the Commission should accept applications with speeds above the current FCC definition of broadband, without setting its own specific benchmark. This approach was used successfully in the Idaho program previously referenced by Verizon, which attached different point values to various combinations of price and upstream / downstream speed combinations ranging from 256:512 kbps to 1000:1000 kbps.¹⁸ This approach would meet the Commission’s obligation to encourage advanced technologies, avoid the negative consequences associated with adopting a specific benchmark, and be consistent with TURN’s earlier “guideline” approach to speed.

III. Regulatory Requirements Associated With Funding Should Be Minimized

Both DRA and TURN seek various requirements on funding recipients in an effort to guarantee particular outcomes. In general, such remnants of “command and control” regulation contradict the Commission’s stated goal to “minimize interference with competitive market forces.”¹⁹ They are antithetical to the fundamentally non-regulated nature of broadband and its market-based success thus far, and risk deterring applicants and skewing the very market forces on which the Commission seeks to rely. For example, both DRA and TURN seek carrier reporting of “actual” or “achieved” speeds in order to insure that stated network speed capabilities are measured and reached.²⁰ Such a requirement would be resource-intensive, costly and inaccurate. Numerous factors, including the wiring in a consumer’s home, the network equipment used, applications in use, and the level of Internet congestion between the consumer and the server can impact achieved speeds for all providers.²¹ Wireless broadband speeds are also affected by a myriad of factors, including the number of users and the distance from a cell tower. Many providers lack the capacity to provide this information today.

¹⁶ Verizon at 7.

¹⁷ Verizon at 8-9.

¹⁸ Opening Comments of Verizon on ACR on Issues Relating to the California Advanced Services Fund, filed September 26, 2007, Att. 1 (Rural Idaho Broadband Investment Program Submission Guide) at 5.

¹⁹ D.07-09-020 at 31.

²⁰ DRA at 9; TURN at 10. However, in earlier reply comments, TURN had recognized that achieving those speeds might not be “cost effective or affordable.” TURN CASF Reply at 8.

²¹ TURN also acknowledged in its earlier reply comments that factors beyond the control of the broadband provider could influence achieved speeds. TURN CASF Reply at 8.

In a similar vein, DRA seeks to require provision of “stand-alone broadband” service to low-income customers for 10 years, and voluntary pricing commitments to other customers for 5 years.²² Verizon earlier raised concerns with any form of pricing regulation.²³ In addition, there is no need to create a separate administrative layer of regulation on providers who accept CASF funds. Indeed, the current CHCF-B fund imposes no such requirements other than to offer the elements of basic service.²⁴

Finally, regarding the surcharge mechanism, DRA recommends a separate CASF line item to aid in “full disclosure.” Verizon agrees that consumers should be informed of the programs they support, but use of a single surcharge is preferable for reasons addressed in opening,²⁵ especially since the CASF is part of the CHCF-B program.

IV. Funding Concerns Could Be Alleviated By Reducing the Cap and Holding Several Rounds Of Grant Applications

AT&T and others echo concerns with the PD’s failure to acknowledge the insufficiency of funds which, at a minimum, creates uncertainty on the part of potential applicants and staff administering the program, and calls into question the Commission’s determination to reduce the size of the CHCF-B and relieve consumers from “excessive” surcharges.²⁶ One simple solution would be to reduce the proposed \$100 million to that amount needed to target only unserved areas, as most parties recommend.²⁷ In addition, the Commission could administer the grant program in stages, making only a portion of the target amount available initially, and accept grants in monthly or quarterly windows for a limited period of time. For example, making \$10-20 million available for the initial round of grant applications,²⁸ would spread out the funding requirement over time, ease concerns about the availability of funds in an initial two-year period, and allow the Commission to assess available funds against the likely demand. Doing so will ease the Commission staff’s workload as well as still have a significant impact; for example, the Idaho program referenced in Verizon’s comments administered a fund of only \$5 million in a single round, but generated 79 projects covering over 48,000 potential subscribers.²⁹

²² DRA at 8-9.

²³ Verizon at 13. See also Verizon October 3, 2007 Reply Comments at 3.

²⁴ D.96-10-066, Appendix B.

²⁵ Verizon at 10.

²⁶ AT&T at 12-14; T-Mobile at 14.

²⁷ Should the Commission decide to target only “unserved” areas, this \$100 million could be reduced, given the PD’s acceptance of Verizon’s rough estimate of \$50-\$80 million for unserved areas only. PD at 22, 23 (Verizon’s estimate reasonable for unserved areas; additional support included for underserved areas).

²⁸ This would equate to four or five rounds, which could be reduced based on experience.

²⁹ See “An Analysis of the 2006 Idaho Rural Broadband Investment Program,” Don Reading, Consulting Economist, Ben Johnson Associates (February 2007), at 3-5, available at <http://www.idahocable.com/Broadband%20Analysis%20Final.pdf>.

This approach would have added benefits as well. For example, various rounds might be targeted to different regions of the state, thus providing some independent prioritization of target areas. Potential applicants could refine their proposals based on grant history, better allocate their limited resources over time, and perhaps submit several grant applications in different areas. Multiple rounds might also better afford smaller applicants the opportunity to review results and participate in later rounds. Commission staff would also gain experience and have the opportunity to refine the application review process before the next round, instead of having to “get it right” the first time. Finally, application rounds will reduce the likelihood that less desirable applications will be awarded funding simply because they are filed early.

Whatever period of time is chosen for program administration, the Commission should not exceed its targeted cap for the program, nor should it increase the CHCF-B surcharge or add any new surcharge to fund this program. In order to minimize market interference, this program should be targeted, limited, and short-lived.

CONCLUSION

Verizon urges the Commission to modify the PD as recommended above.

December 17, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, CA501LB, Thousand Oaks, California 91362; I have this day served a copy of the foregoing, **REPLY COMMENTS OF VERIZON REGARDING PROPOSED DECISION OF COMMISSIONER CHONG IMPLEMENTING CALIFORNIA ADVANCED SERVICES FUND** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17TH day of December, 2007 at Thousand Oaks, California.

_____/s/_____
JACQUE LOPEZ



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[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)